Before the
Federal Communications Commission
Washington, DC 20554

In the matter of:

Revision of Part 22 and Part 90 of the Commission's Rules to Facilitate Future Development of Paging Systems	)	WT Docket No. 96-18
Implementation of Section 309(j) of the Communications Act -- Competitive Bidding	)	PP Docket No. 93-253

To: The Federal Communications Commission

COMMENTS BY RAYMOND C. TROTT, P.E.
ON INTERIM LICENSING PROPOSAL

I, Raymond C. Trott, P.E., pursuant to the Commission's NOTICE OF PROPOSED RULE MAKING, referenced above, adopted February 8, 1996, hereby comment upon the Commission's Interim Licensing Proposal.

I. STATEMENT OF INTEREST & QUALIFICATIONS

1. I am president of Trott Communications Group, Inc., an engineering communications consulting firm serving the Land Mobile and Telecommunicaitons Industries. Our work involves detailed system designs including large and small paging systems for Common Carrier (CCP), Private Carrier (PCP) and private systems. In addition, we conduct detailed interference analyses for various site owners/managers and for Public Safety entities.

2. Our firm represents many small CCP's and PCP's over the U.S., some in large markets but most in smaller markets or rural areas.

II. Expansion & Modification of Existing Systems is Imperative

Commercial Paging Carriers

3. There are areas of the Country that are poorly served or have little or no competitive forces. This "freeze" inhibits new paging entrants and expansion or major modifications of existing paging systems into these areas.

4. Our paging clients are continually modifying their systems to improve their reliability and coverage to their paging customers. New residential communities or industrial complexes are opportunities for the small paging entrenpreneurs to expand their systems and revenues and serve the public in these new areas.

Medical Facilities

5. Our firm has designed several paging systems for medical facilities in various parts of the Country. This "freeze" will impair their ability to enhance coverage where new facilities are being constructed.

6. Because of frequency congestion in the Special Emergency Radio Service, many hospitals have opted to design their systems in the VHF/UHF shared frequency bands. This congestion is further exacerbated by the recent affirmation of the Commission of the reassignment of certain 453 MHz frequencies from the Special Emergency Radio Service to the Emergency Medical Radio Service (EMRS) (PR Docket No. 91-72, Adopted January 14, 1993). With a "freeze" on new entrants into the shared VHF/UHF private paging channels and the VHF CCP channels, where in the spectrum are these medical facilities to go? Now, this "freeze" is not only affecting the commercial public but the safety and well being of the General Public.

Private Companies

7. Our firm represents private companies who implement private paging systems for their own internal use. These range from small contracting firms to large companies such as New England Telephone Company (NETEL). NETEL has implemented a very large wide area paging system in the New England area for internal use for contacting their repair and maintenance personnel. They are continually modifying their system to enhance their coverage and reliability and also expansion into new areas. This "freeze" will place undue hardships on many, many of the private companies who now have implemented wide area systems as well as the business seeking to implement its own paging system.

8. These above reasons alone are sufficient reasons for the Commission to lift this "freeze" on new or modified paging applications.

III. PERMISSIVE MODIFICATIONS (929/931 MHZ)

9. I agree with the Commission allowing carriers to add or modify sites without prior approval if the composite authorized interference contour is not extended over land areas. However, the Commission has failed to consider an important issue; interference to systems in spectral and physical proximity to the 929/931 MHz paging transmitters.

10. With the vast numbers of high power paging transmitters (500 W output / 3500 W ERP) being implemented throughout the Country, one must be aware of their specific locations to protect other systems from intermodulation, transmitter sideband noise and receiver desensitization interference.

11. These high power transmitters add significantly to the ambient noise floors in the spectral regions where base receivers in the 901-902 MHz band (NPCS) are located. Adjacent to that region is the 902-928 MHz frequency band allocated to the Location and Monitoring Service (LMS). When the location of these receiver sites are being determined, research of the FCC data base is required to alert the designer of nearby (not necessarily co-located) high power 929/931 MHz transmitters.

12. A requirement of a detailed interference analysis for the City of Los Angeles Police Department specifies that a data base search of surrounding sites for high power transmitters be conducted and results analyzed for potential interference to the City's mobile data system.

13. Our firm conducts many interference analyses for various entities throughout the U.S. It is imperative that all transmitter locations be retrievable from the FCC database to help not only in predicting potential interference but to also find solutions to existing interference problems.

14. Thus, it is important that there be a notification to the Commission of all locations of paging transmitters regardless of whether the paging station requires prior notification or not. Further, the information on these locations should be available through public-access databases.

Respectfully submitted,

Raymond C. Trott, P.E.
February 28, 1996
Trott Communications Group, Inc.
1425 Greenway Drive, Suite 350
Irving, TX 75038
214/580-1911